

Exhibit 3

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Bitmain Technologies, Ltd.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GOR GEVORKYAN, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

BITMAIN, INC., BITMAIN
TECHNOLOGIES, LTD. and DOES 1
to 10,

Defendants.

Case No. 3:18-cv-07004-JD

**DEFENDANT BITMAIN
TECHNOLOGIES, LTD.'S
FIRST SET OF
INTERROGATORIES TO
CHRISTOPHER
MARLBOROUGH, COUNSEL
FOR PLAINTIFF**

PROPOUNDING PARTY: Defendant Bitmain Technologies, Ltd.

RESPONDING PARTY: Christopher Marlborough, Counsel for Plaintiff Gor
Gevorkyan

SET NUMBER: One

INSTRUCTIONS

1. These Interrogatories concern all information in Your possession, custody, or control, including information in the possession of Your attorneys, agents, servants, representatives, consultants, accountants, investigators, subordinates, or other Persons directly or indirectly employed or retained by them, or anyone else acting on their behalf or subject to their control.

2. If You object to any Interrogatory, state Your objection and the ground or grounds in Your response. If You object to a part of an Interrogatory, Identify the part in Your response and state Your objection and the ground or grounds therefor. No part of an Interrogatory should be left unanswered merely because You object to another part of the Interrogatory.

3. Should You contend that any matter of which an admission is requested cannot be fairly admitted without some material qualification, please provide a sworn statement setting forth in detail the basis for this contention or admitting the matter with such qualification or explanation.

4. If You contend that any information called for by these Interrogatories is objectionable due to a claim of privilege, provide all responsive information that is not subject to a claim of privilege and provide a statement setting forth the specific facts on which You base Your claim of privilege.

5. Each Interrogatory shall be construed independently, and no Interrogatory shall be viewed as limiting the scope of any other Interrogatory.

INTERROGATORIES

INTERROGATORY NO. 1:

State all facts that support Your statement in paragraph 2 of Your Declaration that the “Contact Us” webpage You attached as Exhibit 1 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 2:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 2 of Your Declaration that the “Contact Us” webpage You attached as Exhibit 1 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 3:

State all facts that support Your statement in paragraph 3 of Your Declaration that the job posting You attached as Exhibit 2 to Your Declaration was created by, and solicited applications for a position at, Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 4:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 3 of Your Declaration that the job posting You attached as Exhibit 2 to Your Declaration was created by, and solicited applications for a position at, Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 5:

State all facts that support Your statement in paragraph 4 of Your Declaration that the “Bitmain Support Pages” webpages You attached as Exhibit 3 to Your Declaration were from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 6:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 4 of Your Declaration that the “Bitmain Support Pages” webpages You attached as Exhibit 3 to Your Declaration were from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 7:

State all facts that support Your statement in paragraph 5 of Your Declaration that the “Transparency Policy” webpage You attached as Exhibit 4 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 8:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 5 of Your Declaration that the “Transparency Policy” webpage You attached as Exhibit 4 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 9:

State all facts that support Your statement in paragraph 7 of Your Declaration that the screenshots of Bitmain’s YouTube Channel “About” page, “Videos” page, and screenshots of the YouTube video entitled “A Look Inside Bitmain” You attached as Exhibit 6 to Your Declaration were from webpages operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 10:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 7 of Your Declaration that the screenshots of Bitmain’s YouTube Channel “About” page, “Videos” page, and screenshots of the YouTube video entitled “A Look Inside Bitmain” You attached as Exhibit 6 to Your Declaration were from webpages operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 11:

State all facts that support Your statement in paragraph 8 of Your Declaration that the LinkedIn profile webpage You attached as Exhibit 7 to Your Declaration was from a webpage operated by an employee of Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 12:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 8 of Your Declaration that the LinkedIn profile webpage You attached as Exhibit 7 to Your Declaration was from a webpage operated by an employee of Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 13:

State all facts that support Your statement in paragraph 9 of Your Declaration that the “Repair Guide” webpage You attached as Exhibit 8 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 14:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 9 of Your Declaration that the “Repair Guide” webpage You attached as Exhibit 8 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 15:

State all facts that support Your statement in paragraph 11 of Your Declaration that the “Repair Guide” webpage You attached as Exhibit 10 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 16:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 11 of Your Declaration that the “Repair Guide” webpage You attached as Exhibit 10 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 17:

State all facts that support Your statement in paragraph 12 of Your Declaration that the Google Maps directions from the address You attribute to the Bitmain San Jose NCSA Sales Office located at 300 Park Ave #300, San Jose, CA 95110 attached as Exhibit 11 to Your Declaration were from an office leased, owned, or operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 18:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 12 of Your Declaration that the Google Maps directions from the address You attribute to the Bitmain San Jose NCSA Sales Office located at 300 Park Ave #300, San Jose, CA 95110 attached as Exhibit 11 to Your Declaration were from an office leased, owned, or operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 19:

State all facts that support Your statement in paragraph 13 of Your Declaration that the blog post titled “Bitmain’s 4th Crypto Mining Forum promotes enhanced resource management and pre-announces upcoming new miner” You attached as Exhibit 12 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

INTERROGATORY NO. 20:

Identify each Document, statement, webpage, Communication, or other source supporting Your statement in paragraph 13 of Your Declaration that the blog post titled “Bitmain’s 4th Crypto Mining Forum promotes enhanced resource management and pre-announces upcoming new miner” You attached as Exhibit 12 to Your Declaration was from a website operated by Bitmain Technologies, Ltd.—the defendant in this Action—and not a different Bitmain-related entity.

Dated: January 21, 2020

/s/ Carlos M. Lazatin

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